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January 7, 2002

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, Massachusetts 02110

Re: Western Massachusetts Electric Company, D.T.E. 01-99

Dear Secretary Cottrell:

Enclosed for filing, please find an original and nine (9) copies of the Petition To Intervene of Cambridge Electric Light Company. Also enclosed is a certificate of service. If you have any questions in this matter, please contact me.

Sincerely,

A handwritten signature in black ink that reads "John Cope-Flanagan". The signature is fluid and cursive, with the first name "John" being particularly prominent.

John Cope-Flanagan

Enclosures

cc: Jesse Reyes, Hearing Officer
Stephen Klionsky, Esq.
Joseph Rogers, Assistant Attorney General
David Rosenzweig, Esq.

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Western Massachusetts Electric Company

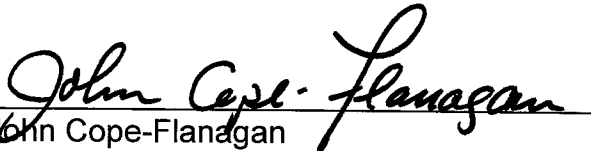
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D.T.E. 01-99

CERTIFICATE OF SERVICE

I certify that I have this day served the foregoing document upon all parties of record in this proceeding in accordance with the requirements of 220 C.M.R. § 1.05 of the Department's Procedural Rules.

Dated at Boston, Massachusetts this 7th day of January, 2002.


John Cope-Flanagan

Counsel for:

Cambridge Electric Light Company
Legal Department, Floor 17
800 Boylston Street
Boston, MA 02199-8003

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Western Massachusetts Electric Company

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D.T.E. 01-99

PETITION TO INTERVENE OF CAMBRIDGE ELECTRIC LIGHT COMPANY

Pursuant to 220 C.M.R. 1.03, Cambridge Electric Light Company, d/b/a NSTAR Electric ("Cambridge"), hereby petitions the Department of Telecommunications and Energy (the "Department") to intervene as a full party in the above-referenced proceeding. In support of its request, Cambridge states the following:

1. Cambridge is a Massachusetts electric company, as defined in G.L. c. 164, § 1, providing retail service in Massachusetts and is subject to the regulatory jurisdiction of the Department. Cambridge provides retail electric service to approximately 44,000 customers in the City of Cambridge, Massachusetts.
2. Cambridge's usual place of business is:

NSTAR Electric
800 Boylston Street
Boston, MA 02199
3. Western Massachusetts Electric Company ("WMECo") and Vermont Yankee Nuclear Power Corporation ("Vermont Yankee") have existing power entitlement obligations between them consisting of: (1) a power contract dated February 1, 1968, as amended by eight amendments (the "Initial Contract"); and (2) an additional contract dated February 1, 1984 (the "Additional Power

Contract,” collectively, the “Power Contract”). Under the Power Contract, WMECo is obligated to take 2.5 percent of the output of the Vermont Yankee’s nuclear power station (the “Station”) and pay the same percentage of the Station’s operating and maintenance expenses and capital costs for a term through March 21, 2012.

4. On November 19, 2001, WMECo filed with the Department a Petition for Approval of a 2001 Amendatory Agreement between WMECo and Vermont Yankee, docketed by the Department as D.T.E. 01-99 (the “WMECo Petition”). The WMECo Petition seeks Department approval of the 2001 Amendatory Agreement, which includes amendments to the existing power contract obligations between WMECo and Vermont Yankee associated with the sale by Vermont Yankee of the Station.
5. Cambridge is a party to an agreement with Vermont Yankee substantially similar in all respects to the Power Contract.
6. On November 2, 2001, Cambridge filed with the Department a petition for approval of a 2001 Amendatory Agreement virtually identical to that under consideration by the Department in this proceeding (the “Cambridge Petition”). The Department docketed Cambridge’s petition as D.T.E. 01-94.
7. Many of the rights and obligations of Cambridge under the terms of its 2001 Amendatory Agreement are the same as, or proportional to, WMECo’s interests in the 2001 Amendatory Agreement at issue in this proceeding (e.g., Cambridge is obligated to take 2.5 percent of the output of the Station and pay the same percentage of the Station’s operating and maintenance expenses and capital costs

for a term through March 21, 2012). Accordingly, Cambridge has a substantial and specific interest in intervening in this proceeding because the WMECo Petition raises the same issues that will be considered in the Department's review of Cambridge's Petition.

8. Cambridge will be substantially and specifically affected by the outcome in this proceeding and meets the statutory (G.L. c. 30A, § 1) and regulatory standards (220 C.M.R. 1.03) for full-party intervenor status.
9. Accordingly, consistent with Department precedent, Cambridge seeks to participate in this proceeding as a full-party intervenor including, where appropriate, the right to file discovery, question witnesses, present testimony and submit briefs for the Department's consideration.

WHEREFORE, for the reasons stated above, Cambridge respectfully requests this Petition to Intervene be granted. Cambridge hereby notices the appearances of the undersigned counsel. It requests that all notices, testimony, pleadings and correspondence pertaining to this proceeding be directed to counsel as shown below.

Respectfully submitted,

CAMBRIDGE ELECTRIC LIGHT COMPANY

By Its Attorneys,

A handwritten signature in cursive script that reads "John Cope-Flanagan". The signature is written in black ink and is positioned above the printed name.

John Cope-Flanagan, Esq.

NSTAR Electric & Gas Corporation

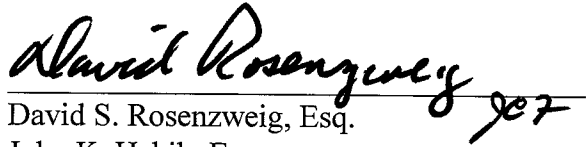
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-and-

A handwritten signature in cursive script that reads "David S. Rosenzweig". The signature is written in black ink and is positioned above the printed name. There is a small mark resembling "je7" at the end of the signature.

David S. Rosenzweig, Esq.

John K. Habib, Esq.

Keegan, Werlin & Pabian, LLP

21 Custom House Street

Boston, Massachusetts 02110

(617) 951-1400 (telephone)

(617) 951-1354 (facsimile)

Date: January 7, 2002